

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
THE NEW YORK TIMES COMPANY, :
 : No. 1:23-cv-11195-SHS-OTW
 :
Plaintiff, :
 :
 :
v. :
 :
 :
MICROSOFT CORPORATION, OPENAI, :
INC., OPENAI LP, OPENAI GP, LLC, :
OPENAI, LLC, OPENAI OPCO LLC, :
OPENAI GLOBAL LLC, OAI :
CORPORATION, LLC, and OPENAI :
HOLDINGS, LLC, X
 :
Defendants.

DAILY NEWS, LP; CHICAGO TRIBUNE :
COMPANY, LLC; ORLANDO SENTINEL :
COMMUNICATIONS COMPANY, LLC; :
SUN-SENTINEL COMPANY, LLC; SAN :
JOSE MERCURY-NEWS, LLC; DP MEDIA :
NETWORK, LLC; ORB PUBLISHING, :
LLC; AND NORTHWEST :
PUBLICATIONS, LLC, :
 :
Plaintiffs, :
 :
v. :
 :
MICROSOFT CORPORATION, OPENAI, :
INC., OPENAI LP, OPENAI GP, LLC, :
OPENAI, LLC, OPENAI OPCO LLC, :
OPENAI GLOBAL LLC, OAI :
CORPORATION, LLC, OPENAI :
HOLDINGS, LLC, :
 :
Defendants.

**MOTION TO WITHDRAW VERA RANIERI AS COUNSEL FOR DEFENDANTS,
OPENAI, INC., OPENAI LP, OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO LLC,
OPENAI GLOBAL LLC, OAI CORPORATION, LLC, AND OPENAI HOLDINGS, LLC**

PLEASE TAKE NOTICE THAT, Morrison & Foerster LLP hereby moves this court for an order pursuant to Local Civil Rule 1.4, relieving Vera Ranieri, as counsel for Defendants OPENAI INC., OPENAI LP, OPENAI LLC, OPENAI GP LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION LLC, and OPENAI HOLDINGS LLC, in the above captioned action on the grounds that she is no longer an attorney with Morrison & Foerster LLP, and respectfully requests that she be removed from the CM/ECF noticing list and any other service list in this case.

PLEASE TAKE FURTHER NOTICE the undersigned counsel from Morrison & Foerster LLP will continue to represent Defendants OPENAI INC., OPENAI LP, OPENAI LLC, OPENAI GP LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION LLC, and OPENAI HOLDINGS LLC.

Dated: January 7, 2025

MORRISON & FOERSTER LLP

By: /s/ Joseph C. Gratz

Joseph C. Gratz (*pro hac vice*)

JGratz@mofo.com

Andrew L. Perito (*pro hac vice*)

APerito@mofo.com

425 Market Street

San Francisco, CA 94105-2482

Telephone: 415.268.7000

Facsimile: 415.268.7522

Rose S. Lee (*pro hac vice*)

RoseLee@mofo.com

707 Wilshire Boulevard

Los Angeles, California 90017-3543

Telephone: (213) 892-5200

Facsimile: (213) 892-5454

Eric K. Nikolaides

ENikolaides@mofo.com

250 W. 55th Street

New York, NY 10019-9601

Telephone: 212.468.8000

Attorneys for Defendants

OPENAI, INC., OPENAI LP, OPENAI

GP, LLC, OPENAI, LLC, OPENAI

OPCO LLC, OPENAI GLOBAL LLC,

OAI CORPORATION, LLC, and

OPENAI HOLDINGS, LLC